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October 6, 2020

VIA ECF

Hon. Andrew T. Baxter
U.S. District Court for the Northern District of New York
Federal Building and U.S. Courthouse
P.O. Box 7396
Syracuse, NY 13261-7396

Re: *Russell v. HealthAlliance Hospital Broadway Campus et al*, 1:20-cv-01204-GLS-ATB

Dear Judge Baxter:

We represent Defendant Ciox Health, LLC (“Ciox”) in the above-caption action, which was removed from New York State Supreme Court, Ulster County, to this Court. We write to request a (14) fourteen-day extension of time to respond to Plaintiff’s Complaint—filed in state court on September 4, 2020 and removed to this Court on September 30, 2020—to and including October 21, 2020.

Under Federal Rule of Civil Procedure 81(c)(2)(C), Ciox’s deadline to answer or otherwise respond to Plaintiff’s complaint is tomorrow, October 7, 2020. Ciox has not made any previous requests for an extension of time in connection with this matter. Ciox requests the current extension to allow it more fully to assess Plaintiff’s allegations, which relate to at least ten requests for medical records spread across a five-month period.

Ciox has made numerous attempts to contact counsel for Plaintiff at the email provided on the state court docket, but has not received a reply. Nor has counsel for Plaintiff appeared in the instant action.

KIRKLAND & ELLIS LLP

Hon. Andrew T. Baxter
October 6, 2020
Page 2

Respectfully submitted,

s/ Jay P. Lefkowitz, P.C.

Jay P. Lefkowitz, P.C.

cc: All counsel of record